

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Harvey and Knotts Drum Site; Wetlands Issues

DATE: 9/16/75

FROM: James R. Butch, Biologist *Jim Butch*
Wetlands and Marine Policy Section (3PM72)

TO: Joseph P. Dugandzic,
Remedial Project Manager
Site Response Section (3HW21)

As a follow up to meetings and conversations with you, Marilyn Plitnik, and staff from the Army Corps of Engineers, and after our site visit and subsequent review of the wetland functional assessment and jurisdictional determination prepared by the Corps, we have the following comments to offer concerning the Harvey and Knotts Drum Site.

We have compared the wetland area delineated in the Corps report with the area proposed for remedial action (soil removal) in the NUS Remedial Investigation Report. This comparison reveals that Site 1 (approximately 1/3 acre) is the only area where direct wetland impacts will occur. As we indicated to you during the course of our coordination meetings, we recommend that the wetland area at Site 1 be restored to the same elevation as presently exists and that the surface be covered with a 6 inch layer of topsoil following the removal action. Following this restoration action the surface should also be reseeded with a mixture of seeds gathered from plant species representative of the surrounding wetland community (e.g., red maple, sweetgum, hickory, blueberry, viburnum, cinnamon fern, cattail, etc.).

Another concern identified during the course of our review is the potential to dewater the wetlands adjacent to the clean up site. This could result from the proposed clean up action which will involve a groundwater extraction, treatment and reapplication program. This action has the potential to lower the groundwater in the adjacent wetlands and thereby significantly impact the wetland ecosystem and its functional values. In order to address this concern, Marilyn Plitnik recommended the placement of piezometers at designated locations adjacent to and possibly within the bordering wetlands. The piezometers can then be monitored during pumping to assure that the groundwater level is not lowered in the vicinity of the wetlands. If the groundwater levels do change as a result of pumping then the rate of pumping can be adjusted accordingly. We support this recommendation and request that in addition, stage gauges be placed in the larger adjacent beaver ponds as another means to evaluate the effects of the pumping on the wetlands.

AD300387

We would like the opportunity to meet on site with you and the remedial design staff responsible for preparing the final clean up design plans and specifications so that we can discuss development of the final restoration and reseeding plans and identify appropriate locations for the piezometers and stage gauges. Also the details of the monitoring provisions can be developed during this meeting.

We appreciate your support and the opportunity to provide our technical input relevant to the wetland concerns at this site.

cc: Galena Chadwick (3HW12)
William J. Hoffman (3PM72)

AR300388